

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
W.R. Grace & Co., <u>et al.</u> ,)	Case No. 01-01139 (JKF)
)	(Jointly Administered)
)	
Debtors.)	Objection Deadline: April 9, 2008
)	Reply Deadline: April 14, 2008
)	Hearing Date: April 21, 2008 @ 12:00 p.m.

NOTICE OF MOTION

ZAI Claimants have filed the attached *ZAI Claimants' Motion for Order to Show Cause Why Court Appointed Expert Witness Should Not Be Designated* (the "Motion").

The Motion seeks the appointment of an expert witness pursuant to Fed. R. Evid. 706 to estimate the scope and extent of the Debtors' potential ZAI liabilities.

If you wish to file a response to the Motion, you must do so on or before **APRIL 9, 2008 at 4:00 p.m. EDT.**

At the same time, you must also serve a copy of the response upon Movant's attorneys at the addresses set forth in the signature block below.

HEARING ON THE MOTION will be held on **APRIL 21, 2008 at 12:00 P.M. EDT.**

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: March 18, 2008
Wilmington, Delaware

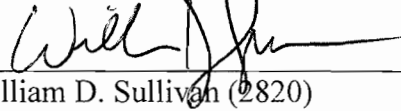
RICHARDSON, PATRICK,
WESTBROOK & BRICKMAN, LLC
Edward J. Westbrook
Robert M. Turkewitz
1037 Chuck Dawley Blvd., Bldg. A
Mt. Pleasant, South Carolina 29464
Telephone: (843) 727-6500

- and -

THE SCOTT LAW GROUP, P.S.
Darrell W. Scott
926 W. Sprague Avenue
Chronicle Building, Suite 583
Spokane, Washington 99201
Telephone: (509) 455-3966

-and-

WILLIAM D. SULLIVAN, LLC

A handwritten signature in black ink, appearing to read 'Will D. Sullivan', is written over a horizontal line.

William D. Sullivan (2820)
Elihu E. Allinson, III (3476)
4 East 8th Street, Suite 400
Wilmington, Delaware 19801
Telephone: (302) 428-8191

Special Counsel for ZAI Claimants